

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

AMEREN TRANSMISSION COMPANY )  
OF ILLINOIS, )  
 )  
Petition for a Certificate of Public )  
Convenience and Necessity, pursuant to )  
Section 8-406.1 of the Illinois Public )  
Utilities Act, and an Order pursuant to )  
Section 8-503 of the Public Utilities Act, )  
to Construct, Operate and Maintain a New )  
High Voltage Electric Service Line and )  
Related Facilities in the Counties of Adams, )  
Brown, Cass, Champaign, Christian, Clark, )  
Coles, Edgar, Fulton, Macon, Montgomery, )  
Morgan, Moultrie, Pike, Sangamon, )  
Schuyler, Scott and Shelby, Illinois. )

No. 12-0598

**PETITION FOR LEAVE TO INTERVENE**

COMES NOW Petitioners, Lela Belle Clapp, Ben Furlong, Abbie Furlong, George Orin, Nancy Orin, Justin Perry, Angie Perry, Kent Stark, Janet Stark, Steven F. Trapp, Robin L. Trapp, Bruce Trefz and Tammy Trefz (hereinafter, the “Rural Clark and Edgar County Concerned Citizens”), by their attorney, William F. Moran, III, and in support of their Petition for Leave to Intervene in the above-captioned cause, state as follows:

1. Petitioners are owners of real estate located in Clark and Edgar Counties, Illinois, directly on or immediately adjacent to the Alternate Route proposed by the AMEREN TRANSMISSION COMPANY OF ILLINOIS (“ATXI”), in its initial Verified Petition filed in this cause, that will be affected by the location of the high voltage electric service line which is the subject of this proceeding.

2. Petitioners will be substantially affected by any decision of the Illinois Commerce

Commission in the above-captioned docket.

3. Petitioners are prepared to and do accept the record and procedural schedule established to date in this docket.

4. Petitioners seek to be treated as active parties in this proceeding to protect their interests.


5. Petitioners will accept electronic service in this proceeding, and would request that their below-identified attorney be added to the service list in this cause.

WHEREFORE, Petitioners hereby request that they be granted leave to intervene and become parties to the above-captioned proceeding, as the "RURAL CLARK AND EDGAR COUNTY CONCERNED CITIZENS," for the purpose of producing evidence, cross-examining witnesses, filing appropriate briefs and pleadings, presenting oral argument, if allowed, and for any and all other purposes allowed by law.

Dated this 14<sup>th</sup> day of February 2013.

Respectfully submitted,

Lela Belle Clapp, Ben Furlong, Abbie Furlong,  
George Orin, Nancy Orin, Justin Perry, Angie Perry,  
Kent Stark, Janet Stark, Steven F. Trapp, Robin L.  
Trapp, Bruce Trefz and Tammy Trefz, Petitioners

By:   
\_\_\_\_\_  
Their attorney

**COUNSEL FOR PETITIONERS:**

William F. Moran III (#06191183)  
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STATE OF ILLINOIS                    )  
  )       SS  
COUNTY OF SANGAMON            )

**VERIFICATION**

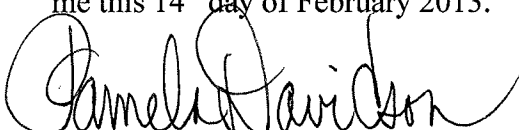
William F. Moran, III, being first duly sworn, deposes and states that he is an attorney licensed and in good standing to practice law in the State of Illinois, that he is the attorney for Petitioners, Lela Belle Clapp, Ben Furlong, Abbie Furlong, George Orin, Nancy Orin, Justin Perry, Angie Perry, Kent Stark, Janet Stark, Steven F. Trapp, Robin L. Trapp, Bruce Trefz and Tammy Trefz, and that he is duly authorized to execute this Petition for Leave to Intervene on behalf of his clients; and further that he has read the above Petition for Leave to Intervene, has knowledge of the facts stated therein, and states that the matters set forth therein are true in substance and in fact.



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William F. Moran III (#06191183)  
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Sworn and Subscribed to before  
me this 14<sup>th</sup> day of February 2013.



NOTARY PUBLIC



**CERTIFICATE OF SERVICE**

I, William F. Moran, III, Counsel for Petitioners, hereby certify that on February 14, 2013, I caused a copy of the foregoing PETITION FOR LEAVE TO INTERVENE to be served by electronic mail on the individuals/entities identified on the Commission's Service List for Docket No. 12-0598.

A handwritten signature in black ink, appearing to read 'W. F. Moran, III', is written above a horizontal line.

Counsel for Petitioners